

UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	:
MOTORS LIQUIDATION COMPANY, et al.,	:
f/k/a General Motors Corp., et al.,	:
	:
Debtors.	:
	:
-----X	

Chapter 11 Case No.:
 09-50026 (REG)
 (Jointly Administered)

**OBJECTION OF CERTAIN MESOTHELIOMA CLAIMANTS TO (I) SUBPOENAS
 ISSUED BY THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO
 CERTAIN ASBESTOS SETTLEMENT TRUSTS AND CLAIMS PROCESSING
 FACILITIES, AND (II) RELATED ORDERS OF THE BANKRUPTCY COURT**

Certain mesothelioma victims who are represented by the law firm Cooney and Conway (the “Cooney Clients”) by and through their undersigned counsel, hereby join in and adopt in full the “Objection of Certain Mesothelioma Claimants to (I) Subpoenas Issued by the Official Committee of Unsecured Creditors to Certain Asbestos Settlement Trusts and Claims Processing Facilities, and (II) Related Orders of the Bankruptcy Court,” filed on November 8, 2010, by various law firms on behalf of their respective clients. In support thereof, the Cooney Clients respectfully state as follows.

1. The Cooney Clients are individuals whose names have been listed in notices issued by certain trusts (the “Trusts”) as persons whose asbestos claims are the subjects of discovery requests put forth in subpoenas (the “Subpoenas”) issued by the Official Committee of Unsecured Creditors (“UCC”) under color of this Court’s Order of August 24, 2010. That Order granted the UCC’s application, as modified, for authority to issue the Subpoenas, subject to the right of affected individuals to make objections.

2. Various law firms representing other persons who have likewise been so listed in notices issued by the Trusts have together filed a paper styled “Objection of Certain Mesothelioma Claimants to (I) Subpoenas Issued by the Official Committee of Unsecured Creditors to Certain Asbestos Settlement Trusts and Claims Processing Facilities, and (II) Related Orders of the Bankruptcy Court,” (the “Objection”).

3. The Cooney Clients hereby join in the Objection and adopt each ground asserted therein as the bases for their own objection to the above-referenced Order of August 24, 2010, and to the Subpoenas.

4. As an additional and supplemental objection, the Cooney Clients point out to the Court that the majority of claims in which discovery is sought are claimants who settled with GM in the tort system. At the time of settlement, GM required all Cooney Client settling parties to agree to stringent confidentiality provisions, including:

- As part of the consideration for entering into this Settlement and Full Final Release, the Releasors and their agents, assigns, wards, executors, successors, administrators, and attorneys, shall maintain in strict confidence, and shall not disseminate, allude to, characterize, quantify, or otherwise reference any and all offers and counter-offers disclosed to them by the other parties or their counsel in the negotiations leading to this settlement, the contents of this Settlement and Full Final Release, or the consideration therefore, (except that the fact that a settlement was reached may be disclosed) and shall use best efforts to prevent disclosure, either directly or indirectly, of such information to any third parties.
- The Releasors and their counsel shall provide no information, other than the fact of settlement, to any consultants and/or experts retained or consulted in this litigation.
- As part of the consideration for entering into this Settlement and Full and Final Release, the Releasors, their attorneys and agents agree, warrant, and represent that they will not pursue any discovery, including but not limited to any and all written discovery, depositions, and subpoenas (non-party or otherwise) against Releasees in any case involving allegations by Releasors of injury arising from exposure to asbestos, any mixed dust products, or silica; this provision encompasses all discovery

whether it has already been served upon Releasees or could be served upon Releasees in the future. (An exemplar copy of a GM drafted release from 2009 is attached as Exhibit 1).

5. GM's stringent confidentiality stipulations and cessation of all discovery were material terms of these settlements in these Claimant's tort cases.

Dated: November 8, 2010

Respectfully Submitted,

COONEY & CONWAY

/s/ John D. Cooney

John D. Cooney

Kathy Byrne

Cooney & Conway

120 N. LaSalle Street, Suite 3000

Chicago, IL 60602

Phone 888-651-1850

jcooney@cooneyconway.com

kbyrne@cooneyconway.com

**Attorneys for Certain Individuals Whose Asbestos Claims are the Subjects of Subpoenas
Issued by the Official Committee of Unsecured Creditors:**

Abernathy, Raymond

Adams, Russell

Allen, George

Allen, Roy

Allen, Roy

Arden, Glendora

Arvidson, Floyd

Asher, Ura

Banycky, Helen

Batteiger, Warren

Becker, Herbert

Behnke, Lorraine

Bell, Gary

Belotti, Ralph

Biekkola, George

Bodnar, William

Boeding, Linus

Lulich, Robert

Luna, James

Madden, Mary

Maisch, Eldon

Maravich, Milton

Martens, Robert

McGrath, Owen

McKeand, Gerald

McNamara, John

Medina, Jose

Meisenhelter, Erwin

Miller, Austin

Moore, Ronald

Mortenson, Maylen

Mullally, Richard

Nannini, William

Nelson, Dennis

Bolden, Thomas
Braun, James
Briesch, Bruce
Broughton, James
Brown, Regina
Buck, Elmes
Budnick, John
Burbo, Edward
Cacioppo, Leon
Caldwell, William
Carlson, Carl
Carr, Robert
Catlett, James
Cave, Glenn
Clavey, Norman
Cleary, James
Colston, William
Cooney, James
Cummings, Jack
Czysz, Paul
Daher, Thomas
Dalstein, Vernon
Davis, Dean
Davis, Merle
Dehghan, Farhad
Deisher, Wilbur
Derdiger, Dudley
Devoto, Dean
Dewald, George
Dudek, Marie
Dunwoody, Charles
Eades, John
Eberhart, George
Eckert, William
Edgar, Norman
Ellis, Charley
Engler, Dennis
Fandl, John
Faulkner, Floyd
Field, Charles
Finkler, Thomas
Fitch, Mildred
Foley, Robert

Newell, David
Nickerson, Ronald
Nicosia, Elizabeth
Nix, James
Nolan, Clarence
Norvell, Morris Sr.
O'Heir, Richard
Ostick, Donald
Parks, Paul
Parks, Wayne
Patton, Jackie
Pazienza, James
Pearson, Arvid
Peffer, Charlotte
Pennell, Doris
Perez, Gonzalo
Perri, Wayne
Pervine, Lynn
Peters, Dallas
Pfister, Frank
Phillips, Thomas
Plaskett, James
Proctor, Charles
Prunty, James
Pugh, Victoria
Pulido, Jesus
Purnell, Rufus
Quick, Karen
Rajczyk, Donna
Raube, Donald
Ray, Glen
Reich, Christopher
Reilly, Frances
Reinholz, Ronald
Rizzuto, Ernest
Roediger, Ottmar
Ronk, Frank
Ross, Bernice
Ross, Bernice
Rozinski, Gary
Safley, Z.L.
Sardella, Robert
Sawyer, Edward

Fridmanski, Robert
Fuegner, Leo
Fulks, Logan
Fuwell, Hilda
Fuzzell, Kenneth
Gaffney, Thomas
Galanis, William
Ganey, Charles
Gardner, Raymond
Gast, Arthur
Gembis, Stanley
Gereg, Joseph
Ghinter, Fay
Gilliam, James
Goldberg, Edna
Goodey, Howard
Grant, Thomas
Grindstaff, Ralph
Gunderson, Robert
Gwizdalski, Stephen
Ham, William
Hamilton, James
Hammer, Ronald
Hammond, Ronald
Hampshire, Marvin
Hansard, Verlin
Hansen, Roger
Hargitt, Glenn
Harnden, Elmer
Harris, Joanne
Hatcher, Jerry
Heimann, Ambrose
Herman, Howard
Hester, John
Hochhalter, Lester
Hoffman, Frank
Holder, Martin
Horrell, Mary
Hughes, Chester
Hyatte, Dale
Iem, Gilbert
Irwin, Barbara
Jakomovich, William

Schaefer, Karl
Schafer, Robert
Schenkenberger, Audry
Schmidt, Holly
Schultz, Roger
Seville, John
Shapach, Stella
Shikoski, Thomas
Sholtz, John
Shull, Charles
Simpson, Andrew
Singer, Joseph
Skaggs, William
Smith, Darol
Smith, Leslie
Smith, Wayne
Smukal, James
Soucek, Milton
Sperling, Marvin
Spicer, Kenneth
Srenaski, Thomas
Stewart, Robert
Supple, Kenneth
Talley, Lloyd
Teater, Howard
Tessereau, Delmar
Thomas, Claud
Thompson, Johnnie
Thompson, Ronald
Timm, Dale
Tobias, Jerome
Tomei, Fred
Tonello, John
Toot, George
Trapp, Leslie
Treber, Laurence
Tripp, James
Trosper, Orville
Turckes, Raymond
Turner, Paul
Usyak, Paul
Valdez, Jose
Van Eperen, Gerald

Janet, Robert
Janisse, Denis
Jarrett, Fredrick, Sr.
Jasper, William
Junius, Joseph
Kamp, Thomas
Kelly, Joan
Kennedy, Frederick
Kinealy, Michael
King, Donald
King, Vernon
Klafmar, Virginia
Knudson, Wayne
Koerner, Donna
Kolbus, Richard
Kozlowski, Walter
Kukula, Albin
Kuna, John
Lawson, Alfred
Leach, Donald
Leapline, William
Leide, Howard
Lindgren, Forest
Loose, Robert
Lopez, Mary
Lorentzen, Nancy
Loutfi, Hassan

Veazey, James
Volluz, Charles
Wagner, Arthur
Wagner, Raymond
Walsh, Thomas
Walters, Marvin
Warner, David
Warner, Lloyd
Weiss, Joyce
Weiss, Lawrence
Wesselhoff, Robert
Wettstein, William "Bill"
Wheeler, Lloyd
Whitcomb, Michael
White, Annie
White, Robert
Whitman, Robert
Wicklund, Oliver
Wishnoff, Evelyn
Wroble, John
Yaeger, William
Yanchick, Dennis
Yates, Earl
Yosick, Dennis
Zeiter, Gerald
Zeller, Donna